

# **EXHIBIT 24**

VIDEOTAPED DEPOSITIONS OF WILLIAM R. YUHASZ AND VICKY M. WILLIAMS  
CONDUCTED ON FRIDAY, FEBRUARY 19, 2010

1 (Pages 1 to 4)

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 RICHMOND DIVISION</p> <p>4 ePlus Inc., )</p> <p>5 Plaintiff, )</p> <p>6 vs. ) CIVIL ACTION NO.</p> <p>7 ) 2:09-CV-232</p> <p>8 PERFECT COMMERCE, INC., )</p> <p>9 SCIQUEST, INC., LAWSON )</p> <p>10 SOFTWARE, INC., and VERIAN )</p> <p>11 TECHNOLOGIES, INC., )</p> <p>12 Defendants. )</p> <p>13 _____ )</p> <p>14 VIDEOTAPED 30(b)(6) DEPOSITION OF NOVANT HEALTH,</p> <p>15 INC., by and through its corporate designees,</p> <p>16 WILLIAM RAY YUHASZ and VICKY MILLER WILLIAMS</p> <p>17 (Taken by Plaintiff)</p> <p>18 Winston-Salem, North Carolina</p> <p>19 Friday, February 19, 2010</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 Reported in Stenotype by</p> <p>Dorothy J. M. McGrath, RPR, Shorthand Reporter</p> <p>25 Transcript Produced by Computer-aided Transcription</p>	1	<p>1 INDEX OF EXAMINATIONS</p> <p>2 By Mr. Robertson .....5</p> <p>By Mr. Graham .....159</p> <p>3 By Mr. Robertson .....167</p> <p>4</p> <p>5 INDEX OF EXHIBITS</p> <p>6 NUMBER DESCRIPTION MARKED</p> <p>7 N1 Subpoena ..... 29</p> <p>8 N2 Lawson Software Product License ..... 45</p> <p>Agreement (NOV0729 - 832)</p> <p>9</p> <p>N3 Lawson Software, Inc., Services ..... 49</p> <p>10 Confirmation (L0156778)</p> <p>11 N4 Product Order Form, Lawson Software ... 50</p> <p>Consumer Agreement (L0156759 - 763)</p> <p>12</p> <p>N5 Lawson Software, Inc., Services ..... 53</p> <p>13 Agreement (NOW0725 - 728)</p> <p>14 N6 Requisition Self-Service RSS 9 ..... 57</p> <p>Training Manual, November 2009</p> <p>(NOV0838 - 868)</p> <p>15</p> <p>N7 Supply Chain NMG Ambulatory Care ..... 63</p> <p>16 Manual (NOV0870 - 904)</p> <p>17</p> <p>N8 Lawson/SciQuest Procure-to-Pay ..... 71</p> <p>18 (P2P) Solutions Overview for Novant</p> <p>Health (LE00509459 - 464)</p> <p>19</p> <p>N9 Series of E-mail with Various ..... 78</p> <p>20 Attached Documents (NOV0394 - 443)</p> <p>21 N10 E-mail with Attached Presentation .... 90</p> <p>Referencing Novant Responses to RFP</p> <p>Question (ePLUS0911571 - 582)</p> <p>22</p> <p>N11 Document Titled Novant Health P2P .... 95</p> <p>23 Project Dated 1/16/2009 (LE00504119</p> <p>- 121)</p> <p>24</p> <p>25</p>	3
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<p style="text-align: right;">97</p> <p>1 out recently for purposes of responding to the</p> <p>2 subpoena?</p> <p>3 MR. YUHASZ: If the -- these documents -- and</p> <p>4 I'm going to have to defer to Vicky to answer.</p> <p>5 MR. STAFFORD: Okay. Did you hear the</p> <p>6 question?</p> <p>7 MS. WILLIAMS: Uh-huh. These documents</p> <p>8 probably existed in hard copies. These were printed</p> <p>9 off or e-mailed -- the electronic copy was e-mailed.</p> <p>10 These documents were prepared over a period of time</p> <p>11 to use for just -- by training in our department.</p> <p>12 MR. ROBERTSON: Okay. Much like the other</p> <p>13 document we saw earlier, it's just sort of the</p> <p>14 internal manual that shows people how to do --</p> <p>15 MS. WILLIAMS: Right.</p> <p>16 MR. ROBERTSON: -- go through the procurement</p> <p>17 process of requisition self-service?</p> <p>18 MS. WILLIAMS: Yes, and these are totally</p> <p>19 prepared by us.</p> <p>20 MR. ROBERTSON: And you -- you captured screen</p> <p>21 shots in here with respect to the Lawson RSS</p> <p>22 application; is that right?</p> <p>23 MS. WILLIAMS: I'm not sure if there was -- if</p> <p>24 there's RSS screen prints in here. My team doesn't</p> <p>25 use RSS as much as the end requisitioners would.</p>	<p style="text-align: right;">99</p> <p>1 system?</p> <p>2 MR. YUHASZ: Yes.</p> <p>3 MR. ROBERTSON: And then there's an entry for a</p> <p>4 design studio. Do you see that?</p> <p>5 MR. YUHASZ: Yes.</p> <p>6 MR. ROBERTSON: Do you know what the design</p> <p>7 studio is?</p> <p>8 MR. YUHASZ: Yes. My knowledge of that is it's</p> <p>9 an application for the Lawson application technical</p> <p>10 team under information technology to be able to</p> <p>11 change the look, feel, and processing of an online</p> <p>12 form -- Lawson online form.</p> <p>13 MR. ROBERTSON: Do you know if the design</p> <p>14 studio was utilized with respect to the requisition</p> <p>15 self-service application to do --</p> <p>16 MR. YUHASZ: My -- my knowledge is that design</p> <p>17 studio is not -- does not -- cannot be used with</p> <p>18 RSS.</p> <p>19 MR. ROBERTSON: Okay. You didn't change the</p> <p>20 look and feel of RSS as part of the implementation?</p> <p>21 MR. YUHASZ: No, my understanding has always</p> <p>22 been you can't.</p> <p>23 MR. ROBERTSON: Okay. Thanks.</p> <p>24 (EXHIBIT NUMBER N14 WAS MARKED FOR IDENTIFICATION.)</p> <p>25 MR. ROBERTSON: Let me show you what's been</p>
<p style="text-align: right;">98</p> <p>1 Buyers don't create requisition.</p> <p>2 MR. ROBERTSON: Okay. All right. That's all I</p> <p>3 have on that document. Thanks.</p> <p>4 (EXHIBIT NUMBER N13 WAS MARKED FOR IDENTIFICATION.)</p> <p>5 MR. ROBERTSON: Let me show you what I've</p> <p>6 marked as Novant Exhibit Number 13 and ask you to</p> <p>7 take a look at that, if you will. It's a two-page</p> <p>8 document, bears the Bates Label L0156732 [dash] 33.</p> <p>9 Have you seen that before, sir?</p> <p>10 MR. YUHASZ: No.</p> <p>11 MR. ROBERTSON: It's entitled, "Addendum to</p> <p>12 Lawson product software license agreement," and it's</p> <p>13 with the client named Novant Health. Do you see</p> <p>14 that?</p> <p>15 MR. YUHASZ: Yes.</p> <p>16 MR. ROBERTSON: And it's dated sometime in</p> <p>17 March of 2004. Do you see that?</p> <p>18 MR. YUHASZ: Yes.</p> <p>19 MR. ROBERTSON: Is that about the time that</p> <p>20 Novant was implementing the RSS solution?</p> <p>21 MR. YUHASZ: It was probably when we were</p> <p>22 considering, right.</p> <p>23 MR. ROBERTSON: All right -- under -- the</p> <p>24 products under agreement, section 1.0, you see</p> <p>25 there's a column that says business management</p>	<p style="text-align: right;">100</p> <p>1 marked as Novant Exhibit 14 and ask you to take a</p> <p>2 look at that, sir. And while you do, let me just</p> <p>3 for the record say it's a document -- two-page --</p> <p>4 two pages entitled, "Lawson Software, Inc., services</p> <p>5 order form." It's dated in the June of 2006 time</p> <p>6 frame.</p> <p>7 The question -- first question is, have</p> <p>8 you seen this document before?</p> <p>9 MR. YUHASZ: No.</p> <p>10 MR. ROBERTSON: Okay. It's -- it's an order</p> <p>11 form that is with Novant Health. Do you see that</p> <p>12 under client information?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Okay. The services that are</p> <p>15 desired are technical consulting for installation</p> <p>16 and migration on the test server. Do you see that?</p> <p>17 MR. YUHASZ: Yes.</p> <p>18 MR. ROBERTSON: Do you know if this was in</p> <p>19 connection with the RSS application?</p> <p>20 MR. YUHASZ: By the information -- if you look</p> <p>21 under the work order request, the information under</p> <p>22 the client information and the work order request</p> <p>23 row --</p> <p>24 MR. ROBERTSON: Where were you looking at, sir?</p> <p>25 MR. YUHASZ: Work order request.</p>

<p style="text-align: right;">101</p> <p>1 MR. ROBERTSON: Okay. Yeah.</p> <p>2 MR. YUHASZ: And it says LSF9.</p> <p>3 MR. ROBERTSON: Yes.</p> <p>4 MR. YUHASZ: That would indicate that is for</p> <p>5 the environment portion of Lawson that supports</p> <p>6 every application under -- running on the Lawson</p> <p>7 server --</p> <p>8 MR. ROBERTSON: Okay.</p> <p>9 MR. YUHASZ: -- and so that was -- this was a</p> <p>10 technical installation of the environment services</p> <p>11 or main infrastructure of the Lawson application.</p> <p>12 MR. ROBERTSON: Which would support the RSS?</p> <p>13 MR. YUHASZ: Yes.</p> <p>14 MR. ROBERTSON: Okay. Thanks. That's all I</p> <p>15 have on that question -- on that document. Excuse</p> <p>16 me. Let me just ask some general questions about</p> <p>17 requisition self-service right now, and -- and if</p> <p>18 necessary, let's include the purchase order module</p> <p>19 that, you know, is part of the procurement process</p> <p>20 and perhaps inventory control if -- if it calls for</p> <p>21 it.</p> <p>22 MR. YUHASZ: Okay.</p> <p>23 MR. ROBERTSON: Okay. With that in mind, I</p> <p>24 think you indicated earlier that there were</p> <p>25 approximately 10,000 different vendors that provide</p>	<p style="text-align: right;">103</p> <p>1 mind, and that was a stent, I believe, was one that</p> <p>2 you may be able to source from multiple vendors; is</p> <p>3 that right?</p> <p>4 MR. YUHASZ: Yes.</p> <p>5 MR. ROBERTSON: Okay. I understood you to say</p> <p>6 that the items were medical or surgical supplies; is</p> <p>7 that right?</p> <p>8 MR. YUHASZ: Primarily.</p> <p>9 MR. ROBERTSON: Okay. What other --</p> <p>10 MR. YUHASZ: The majority --</p> <p>11 MR. ROBERTSON: I'm sorry.</p> <p>12 MR. YUHASZ: The majority.</p> <p>13 (DISCUSSION OFF THE RECORD)</p> <p>14 MR. ROBERTSON: What other types of products</p> <p>15 other than medical or surgical supplies are</p> <p>16 available to a purchaser using the RSS system at</p> <p>17 Novant?</p> <p>18 MR. YUHASZ: The next category would be EVS or</p> <p>19 environmental services, and that would include your</p> <p>20 cleaners, your paper towels, toilet paper.</p> <p>21 MR. ROBERTSON: All right. Any -- after that,</p> <p>22 what's maybe the next category of items that might</p> <p>23 be available to a user of the RSS system at Novant?</p> <p>24 MR. YUHASZ: The others would be what we</p> <p>25 consider physician preference items such as implants</p>
<p style="text-align: right;">102</p> <p>1 items that are available for purchase through the</p> <p>2 RSS system; is that right?</p> <p>3 MR. YUHASZ: Yes.</p> <p>4 MR. ROBERTSON: Okay. Do you know</p> <p>5 approximately how many total items of those 10,000</p> <p>6 vendors are perhaps available?</p> <p>7 MR. YUHASZ: That we have established in -- as</p> <p>8 an active status in our item master that's available</p> <p>9 for ordering?</p> <p>10 MR. ROBERTSON: Yes?</p> <p>11 MR. YUHASZ: That's what that would indicate.</p> <p>12 I would say it's between 70 and 80,000.</p> <p>13 MR. ROBERTSON: Okay. And maybe informally off</p> <p>14 the record we discussed this, but there -- will</p> <p>15 there be duplicate items that will be available from</p> <p>16 multiple vendors of those 50,000 items or so --</p> <p>17 excuse -- 70 to 80,000?</p> <p>18 MR. YUHASZ: I would have to say just because</p> <p>19 of the large number of items that there's -- there</p> <p>20 are probably duplicates --</p> <p>21 MR. ROBERTSON: I think --</p> <p>22 MR. YUHASZ: -- to separate -- to different</p> <p>23 vendors.</p> <p>24 MR. ROBERTSON: I'm sorry. I think before we</p> <p>25 started the deposition, we had one such example in</p>	<p style="text-align: right;">104</p> <p>1 for procedure.</p> <p>2 MR. ROBERTSON: How about pharmaceuticals? Are</p> <p>3 they available?</p> <p>4 MR. YUHASZ: No. I mean, not in the -- very</p> <p>5 few, very small, not controlled substances that --</p> <p>6 MR. ROBERTSON: We briefly touched on some of</p> <p>7 the data that's available when someone is making a</p> <p>8 purchase of a particular item using RSS. Do you</p> <p>9 recall that?</p> <p>10 MR. YUHASZ: Say that again.</p> <p>11 MR. ROBERTSON: The -- the information that's</p> <p>12 available with respect to a particular item --</p> <p>13 MR. YUHASZ: Oh, yes.</p> <p>14 MR. ROBERTSON: Okay. Where we talked about</p> <p>15 pricing information, right?</p> <p>16 MR. YUHASZ: Correct.</p> <p>17 MR. ROBERTSON: And -- and product descriptions</p> <p>18 are available, correct?</p> <p>19 MR. YUHASZ: Yes.</p> <p>20 MR. ROBERTSON: And the identification perhaps</p> <p>21 of the manufacturer?</p> <p>22 MR. YUHASZ: Yes.</p> <p>23 MR. ROBERTSON: And who the actual supplier is</p> <p>24 would be available?</p> <p>25 MR. YUHASZ: Yes.</p>

<p>173</p> <p>1 MR. ROBERTSON: All right.</p> <p>2 MR. STAFFORD: The representatives will read</p> <p>3 and sign. Thank you.</p> <p>4 VIDEO TECHNICIAN: This completes the --</p> <p>5 30(b)(6) deposition of William Ray Yuhasz and</p> <p>6 Vicky Williams. The number of tapes used were four.</p> <p>7 Going off the record, the time is 13:34.</p> <p>8 (EXHIBIT NUMBER N15 WAS MARKED FOR IDENTIFICATION.)</p> <p>9 (SIGNATURE RESERVED)</p> <p>10 (DEPOSITION CONCLUDED AT 1:34 P.M.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>175</p> <p>1 STATE OF NORTH CAROLINA</p> <p>2 COUNTY OF FORSYTH</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 I, Dorothy J. M. McGrath, RPR, a Notary</p> <p>6 Public, do hereby certify that there came before me</p> <p>7 on Friday, February 19, 2010, the person</p> <p>8 hereinbefore named who was by me duly sworn to</p> <p>9 testify to the truth and nothing but the truth of</p> <p>10 his or her knowledge concerning the matters in</p> <p>11 controversy in this cause; that the witness was</p> <p>12 thereupon examined under oath, the examination</p> <p>13 reduced to typewriting under my direction, and the</p> <p>14 deposition is a true record of the testimony given</p> <p>15 by the witness.</p> <p>16 I further certify that I am neither</p> <p>17 attorney or counsel for, nor related to, or employed</p> <p>18 by any attorney or counsel employed by the parties</p> <p>19 hereto or financially interested in the action.</p> <p>20 IN WITNESS WHEREOF, I have hereto set my</p> <p>21 hand this 26th day of February, 2010.</p> <p>22</p> <p>23 _____</p> <p>24 Dorothy J. M. McGrath, Notary Public</p> <p>25 Notary Public Number 20030710028</p>
<p>174</p> <p>1 STATE OF NORTH CAROLINA</p> <p>2 COUNTY OF FORSYTH</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 I, Dorothy J. M. McGrath, RPR, a Notary</p> <p>6 Public, do hereby certify that there came before me</p> <p>7 on Friday, February 19, 2010, the person</p> <p>8 hereinbefore named who was by me duly sworn to</p> <p>9 testify to the truth and nothing but the truth of</p> <p>10 his or her knowledge concerning the matters in</p> <p>11 controversy in this cause; that the witness^ was</p> <p>12 thereupon examined under oath, the examination</p> <p>13 reduced to typewriting under my direction, and the</p> <p>14 deposition is a true record of the testimony given</p> <p>15 by the witness^.</p> <p>16 I further certify that I am neither</p> <p>17 attorney or counsel for, nor related to, or employed</p> <p>18 by any attorney or counsel employed by the parties</p> <p>19 hereto or financially interested in the action.</p> <p>20 IN WITNESS WHEREOF, I have hereto set my</p> <p>21 hand this 26th day of February, 2010.</p> <p>22</p> <p>23 _____</p> <p>24 Dorothy J. M. McGrath, Notary Public</p> <p>25 Notary Public Number 20030710028</p>	<p>176</p> <p>1 WITNESS'S CERTIFICATE</p> <p>2</p> <p>3 I, WILLIAM RAY YUHASZ, do hereby certify</p> <p>4 that I have read and understand the foregoing</p> <p>5 transcript and believe it to be a true, accurate, and</p> <p>6 complete transcript of my testimony, subject to</p> <p>7 the attached list of changes, if any.</p> <p>8</p> <p>9 _____</p> <p>10 WILLIAM RAY YUHASZ</p> <p>11</p> <p>12 This deposition was signed in my presence by</p> <p>13 _____, on the _____ day of</p> <p>14 _____, 2010.</p> <p>15</p> <p>16 _____</p> <p>17 Notary Public</p> <p>18 My commission expires:</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>